

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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REYNA ARROYO,

Plaintiff,

-against-

THE DEPARTMENT OF EDUCATION OF THE CITY
OF NEW YORK,

Defendant.
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**DECLARATION OF
ASSISTANT CORPORATION
COUNSEL ALANA R.
MILDNER IN SUPPORT OF
DEFENDANT'S MOTION TO
DISMISS THE COMPLAINT**

Civil Action No. 19 Civ. 7416(ER)

ALANA R. MILDNER, declares that the following is true and correct under
penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Corporation Counsel in the office of James E. Johnson,
Corporation Counsel of the City of New York, attorney for Defendant in the above referenced
action.

2. I submit this declaration in order to place before the Court documents of
which judicial notice may be taken and are offered in support of Defendant's motion to dismiss
pursuant to Federal Civil Procedure Rule 12(b)(6). The documents are attached hereto as:

Exhibit A: Decision, *In the Matter of the Disciplinary Proceeding between
New York City Department of Education and Reyna Arroyo*, SED
File No. 31,399, dated May 30, 2018.

Exhibit B: Verified Amended Petition, *Arroyo v. New York City
Board/Department of Education*, Index No. 100741/2018, dated
June 15, 2018

Exhibit C: Transcript, New York State Supreme Court, New York County,
Index No. 100741/2018, dated November 29, 2018

Exhibit D: Collective Bargaining Agreement between United Federation of
Teachers and New York City Department of Education, 2008 -
2019

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: New York, New York
December 30, 2019

/s/

Alana R. Mildner
Assistant Corporation Counsel